

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ AUG 12 2019 ★

BROOKLYN OFFICE

EDGARDO RODRIGUEZ,

Plaintiff,

v.

NEW YORK CITY, US MARSHALL
et al, PETER HERZ MD, PETER
WACHTER, DO. RAYMOND L.
COLON ESQ. JAMES P. HARDING
ESQ.; US OF AMERICA, GRULLON

AMEND COMPLAINT

19-CV-1526(LDH)(LB)

PLAINTIFF'S AMEND COMPLAINT

Plaintiff Edgardo Rodriguez, for his first Amend Complaint against defendant's New York City, US Marshall et al, Peter Herz MD., Peter Wachter DO., Raymond L. Colon Esq., James P. Harding Esq., US of America, Grullon official capacities and physical capacities.

JURISDICTION AND VENUE

This Court has jurisdiction over action under 28 U.S.C. Section § 1331, 42 U.S.C. § 1983, 42 U.S.C. § 1441, 28 U.S.C. § 1332(a).

III. Defendants

1. New York City
2. US Marshall et al
3. Peter Herz MD
4. Peter Wachter DO.

Plaintiff's explain these defendant's are a part of original complaint.

NEW DEFENDANT'S

5. Name of Fifth Defendant: Raymond L. Colon

Employed as Attorney at Law Firm

Mailing Address: 233 Broadway #5 New York, NY 10279

6. Name of Sixth Defendant: James P. Harding

Employed as Attorney at law Firm

Mailing Address: 8059 Lefferts BLVD New Gardens, NY 11415-1735

IV. STATEMENT OF CLAIM

1. New York City: personally Involved in their official capacity and physical capacity John Doe's. When Plaintiff was wrongfully detain after serving state sentence for almost eight months a total of almost 240 some days. Plaintiff concluded his sentence Dec. 12, 2017 to Aug. 16, 2018 at this point Plaintiff sentence was done on Dec. 12, 2017 and OBCC still detain Plaintiff up until July 13, 2018. This is why the City of New York is liable to the cliam under Plaintiff Fourteen Amendments Right, Eight Amendment and Fifth Amendment Rights. While being house illegally Plaintiff sustain two injuries on 6/25/18 and 7/27/18 which cause Plaintiff to suffer emotional distress when knowing from the start Plaintiff should not been house at OBCC because his time was concluded. The facts AMKC 695 "Grullon" "311" # C-1-1-16005-11098 "Social Service"."OBCC" John Doe. It was also clear Plaintiff was in State Custody 9-3-13 up to Sept 2015 and on the day of Trial Term recieve time serve for 24 months. Then for some unknown reason Plaintiff appear back to State Custody was the time was concluded.
2. US Marshall et al: personally involved in their official capacity and physical capacity John Doe's. These defendants were involved in my transfer to AMKC 695 and OBCC which cause me to suffer a injuries on 6/25/18 and 7/27/18. When the facts my sentence was concluded to these charges back in Sept.2015 in State Court which was a sentence to time serve. Thereafter US Marshall's John Doe's should have never sent Plaintiff back to Rikers Island AMKC and OBCC. See(Exhibits (A) and (B). These were violation of my Fourth Amendment Rights, Eighth Amendment Rights and Fourteen Amendment Rights.
3. Peter Herz MD: personally involved in, his--official capacity and physical capacity. When facts are concluded that it is challenge that should be concluded into the complaint base on facts that these contentions should be group with each other base upon Unlawful Detention.
4. Peter Wachter, DO: personally involved in, his--official capacity and physical capacity. When facts are concluded that it is challenge that should be concluded into the complaint base on facts that these contentions should be group with each other base upon Unlawful Detention.
5. Raymond L. Colon ESQ: personally involved in his physical capacity when the facts Plaintiff repeatedly called Attorney for the state in regards of why Plaintiff is being house at OBCC and AMKC. Colon did nothing to help when Plaintiff suffer pain and suffering and

Cruel and Unusual Punishment then delay due process when the facts Plaintiff was deprive of his right to liberty in life.

6. UNITED STATES OF AMERICA: personally involved when plaintiff was instructed to be sent back to the State Court. The facts is clear Plaintiff should have never went to State but was taken to OBCC and AMKC in Riker Island for a period of time of eight months Plaintiff was lost in system but all actuality United States of America should have sent Plaintiff to BOP Prisons. At this time Plaintiff is challenging a pending 28 U.S.C. § 2255(f)(1) in front of Honorable Judge Seybert Cr 15-652(JS)/CV 18-6547 under these challenges of Plaintiff not having his state and federal sentence run concurrent. At this time Plaintiff should be under relief for Eighth Amendment Rights, Fourth Amendment, Fourteenth Amendment and Fifth Amendment Rights.
7. Grullon: personally involved in his official capacity and physical capacity as "311" Social Service for OBCC in Riker Island exhibit (A) this action is connected to Claim One.

RELIEF

1. Plaintiff should be rewarded amount of 500,000 hundred thousand due to compensatory damages, cruel an unusual punishment, punitive damage. "New York City"
2. Plaintiff should be rewarded amount of 750,000 hundred thousand due to compensatory damages, cruel an unusual punishment, punitive damage, wrongfully in prison. "US Marshall et al"
3. Plaintiff should be reward amount of 500,000, due to Raymond L. Colon Esq. deprive Plaintiff of life of liberty and could have help Plaintiff from suffering pain and suffering and emotional distress under Eighth Amendment Violation and Fourth Amendment.
4. Plaintiff should be reward amount of 500,000, due to James P. Harding Esq., deprive Plaintiff of life of liberty and could have help Plaintiff from suffering pain and suffering and emotional distress under Eighth Amendment Violation and Fourth Amendment also Fourteen Amendment Rights.
5. Plaintiff should be rewarded amount of 500,000 hundred thousand due to compensatory damages, cruel an unusual punishment, punitive damage."United States of America"
6. Plaintiff should be reward amount 500,000 hundred thousand due to depriving Plaintiff his rights of life or liberty Fifth Amendment and Fourteen Amendment Violation.

Plaintiff will support his First Amended Complaint with these reason and further display that it should warranted Discovery upon the "John Doe's" defendants which are not a part the complaint.

The facts Plaintiff cannot meet deliberate indifference claim upon each doctor Peter Herz MD, Peter Wachter DO.,but the facts Plaintiff can meet the challenge to concluded the incidents with his Unlawful Detention claim and these claims should be consolidated as one claim.


Furthermore Plaintiff rely on theory of these caselaw to carry the day in turn. See(Francis v. Fiacco, 2018 U.S. Dist. Lexis 43264, 9:15-cv-901(MDD/ATB) ND NY March 16, 2018)(4th, 8th and 14th amendment rights were in violation such as in plaintiff case). See(Bellamy v. City of new York, 914 F.3d 727; 757-61(2d cir. 2019)(holding that the City of New york was proper defendant for purposes of a Monell claim that alleged unconstitutional poliies at district attorney's office). See(Bey ex rel. Palmgren v. NYCeWheels, 2019 U.S. Dist. Lexis 83001 18-cv-9358 (CM) SD NY May 15, 2019)(Leave To Replead).

Plaintiff will encourage this court to develop the record at this time and move forward to "Rule 16 Discovery Conference", then apply the facts that are very clear Plaintiff was subjected to unlawful imprisonment. See(Akande v. US, 2018 U.S. Dist. Lexis 44381 No. 3:11-cv-1125(RNC) D. Conn. Mar. 19, 2019).

Wherefore Mr. Rodriguez prays Honorable District Court Lashann Dearcy Hall GRANTED Plaintiff Leave To Amend Complaint and further turn to Discovery Rule 16 Conference under Rule 26(a)(1).

Date: Aug. 7, 2019

Respectfully Submitted,


Edgardo Rodriguez #86321-053
FCI Allenwood Medium
P.O. Box. 2000
White Deer, PA. 17887

 *** TX Result Report ***

Sending is complete.

Job Number	3400
Address	12127665899
Name	
Start Time	09/26 05:02 PM
Call Length	00'44
Sheets	7
Result	OK

08/16/18
 15:02:48

RECEPTION/CLASSIFICATION SYSTEM

LEGAL DATE COMPUTATION

BY: C240MXV

COMP DATE/TIME: 08/16/2018 02:30P

TYPE B02 BASIC DETERMINATE

DIN: 18A3224 NAME: RODRIGUEZ, EDGARDO

NYSID: 07672700K

DATE RECEIVED: 08/16/2018

CURRENT LOCATION: DWNSTATE REC - 02-0D-019

HEARING DATE	2018 09	TIME ALLOWANCE COMM DATE	2018 09
HEARING TYPE	CRC	TIME ALLOWANCE COMM TYPE	CRIE
TENTATIVE RELEASE DATE		POST-RELEASE SUPERVISION	0002 06 00
GRADUATION DATE		PRS MAXIMUM EXPIRATION DT	
		DETERMINE TERM	0002 00 00
		DATE RECEIVED	+2018 08 16
		JAIL TIME	+0002 09 06

		MAXIMUM EXPIRATION DATE	=2017 11 09
		GOOD TIME POSSIBLE	-0000 03 14

		CONDITIONAL RELEASE DATE	=2017 07 25

LIMITED CREDIT TIME POSS	0000 06 00
LIMITED CREDIT TIME DATE	2017 01 25

COMMENTS:

JAIL TIME(S) IN DAYS:

JAIL TIME = 1006

DIST: REC (1), GUID & COUNS UNIT (1), INST PAROLE (1), INMATE (1)

~~Exhibit~~ Exhibit (A)

08/16/18
15:02:48

RECEPTION/CLASSIFICATION SYSTEM

LEGAL DATE COMPUTATION BY: C240MXV

COMP DATE/TIME: 08/16/2018 02:30P

TYPE B02 BASIC DETERMINATE

DIN: 18A3224 NAME: RODRIGUEZ, EDGARDO

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GRADUATION DATE		PRS MAXIMUM EXPIRATION DT	
		DETERMNATE TERM	0002 00 00
		DATE RECEIVED	+2018 08 16
		JAIL TIME	-0002 09 06

		MAXIMUM EXPIRATION DATE	=2017 11 09
		GOOD TIME POSSIBLE	-0000 03 14

		CCNDITIONAL RELEASE DATE	=2017 07 25

LIMITED CREDIT TIME POSS	0000 06 00
LIMITED CREDIT TIME DATE	2017 01 25

COMMENTS:

JAIL TIME(S) IN DAYS:
JAIL TIME = 1006

DIST: IRC (1), GUID & COUNS UNIT (1), INST PAROLE (1), INMATE (1)

Exhibit(A)

THE CITY OF NEW YORK DEPARTMENT OF CORRECTION
06-JUN-18 09:03:30 JAIL TIME CALCULATION (JTIM)
NYSID: 07672700K Docket #: 2013QN049536 Indictment #: 02981/2013
Name: RODRIGUEZ, EDGARDO Calculated Jail Time : 0936
Controlling City Sentence Time: 70000 + Additional Jail Time : 0000
Press F12 to print Jail Time Certification - Excess Jail Time : 0000
Total Jail Time : 0936
All JTIM Credit Entered?: N

* OTHER JURISDICTION - MIGHT HAVE ADDITIONAL JAIL TIME

Branch to:

BK&CS	Associated Docket/Ind	Arrest Date	Discharge Date	Code	Last Start Hous Sent_Dt	City Sent #	# Days
8951701619	2013QN049536	12DEC17			AMKC		0177
8251301707	2013QN049536	31DEC13	13OCT15	ND	AMKC		0652 *
4411308479	2013QN049536	03SEP13	31DEC13	KW	CIFM 19DEC13	713-4713	0107

"311"
#C-1-1-1600511098
grallon social service

OBCC

Upper

Exhibit (A)

28-JUN-18 10:59:13 State Ready Inquiry Screen (QSR)		
BK&CS: 8951701619 Name: RODRIGUEZ, EDGARDO NYSID: 07672700K		
DOB: 28-MAR-76 1st Sentence Indic#: 02981/2013 (Q) 1st Sentence date: 12-DEC-17		
2nd Sentence Indic#: 3rd Sentence Indic#:		
Ct.Part:	Facility: OBCC	Discharge Date:
Did Court Facility Receive PSI?: Commitment Papers?:		
Paper/Hold Problem.:		
State Ready Eligible?: Y State Ready Eligible Date: 21-JUN-18		
Special: Contract Inmate? N		
Special Other:		
Paperwork Received by GMDC?: Y Date Received: 21-JUN-18		
# of Declarations: 1 Declared Date: 22-JUN-18		
Reject Reason: Reject Date:		

Branch to:

STATE_READY

Exhibit (A)

13-JUL-18 09:19:23 State Ready Inquiry Screen (QSR)		
BK&CS: 8951701619 Name: RODRIGUEZ, EDGARDO NYSID: 07672700K		
DOB: 28-MAR-76 1st Sentence Indic#: 02981/2013 (Q) 1st Sentence date: 12-DEC-17		
2nd Sentence Indic#: 3rd Sentence Indic#:		
Ct.Part:	Facility: OBCC	Discharge Date:
Did Court Facility Receive PSI?: Commitment Papers?:		
Paper/Hold Problem.:		
State Ready Eligible?: Y State Ready Eligible Date: 12-JUL-18		
Special: Contract Inmate? N		
Special Other:		
Paperwork Received by GMDC?: Y Date Received: 21-JUN-18		
# of Declarations: 2 Declared Date: 13-JUL-18		
Reject Reason: Reject Date:		

Branch to:

STATE_READY

Exhibit (A)

13-JUL-18 09:19:23 State Ready Inquiry Screen (QSR)		
BK&CS: 8951701619 Name: RODRIGUEZ, EDGARDO		NYSID: 07672700K
DOB: 28-MAR-76 1st Sentence Indic#: 02981/2013 (Q) 1st Sentence date: 12-DEC-17		
2nd Sentence Indict#:		3rd Sentence Indict#:
Ct.Part:	Facility: OBCC	Discharge Date:
Did Court Facility Receive PSI?:		Commitment Papers?:
Paper/Hold Problem.:		
State Ready Eligible?: Y		State Ready Eligible Date: 12-JUL-18
Special:		Contract Inmate? N
Special Other:		
Paperwork Received by GMDC?: Y		Date Received: 21-JUN-18
# of Declarations: 2 Declared Date: 13-JUL-18		
Reject Reason:		Reject Date:

Branch to:

STATE_READY

Exhibit (A)

18-JUL-18 08:42:59 State Ready Inquiry Screen (QSR)	
BK&CS: 8951701619 Name: RODRIGUEZ, EDGARDO NYSID: 07672700K	
DOB: 28-MAR-76 1st Sentence Indic#: 02981/2013 (Q) 1st Sentence date: 12-DEC-17	
2nd Sentence Indict#: 3rd Sentence Indict#:	
Ct.Part:	Facility: OBCC Discharge Date:
Did Court Facility Receive PSI?: Commitment Papers?:	
Paper/Hold Problem.: State Ready Eligible?: State Ready Eligible Date:	
Special:	Contract Inmate? N
Special Other:	
Paperwork Received by GMDC?: Y	Date Received: 21-JUN-18
# of Declarations: 2 Declared Date: 13-JUL-18	
Reject Reason: ICP Improper Comm Papers Reject Date: 13-JUL-18	

Branch to:

STATE_READY

Exhibit (A)

08-AUG-18 09:05:00		State Ready Inquiry Screen (QSR)	
BK&CS: 8951701619		Name: RODRIGUEZ, EDGARDO	
DOB: 28-MAR-76		NYSID: 07672700K	
1st Sentence Indic#: 02981/2013		(Q)1st Sentence date: 12-DEC-17	
2nd Sentence Indict#:		3rd Sentence Indict#:	
Ct.Part:		Facility: OBCC	
		Discharge Date:	
Did Court Facility Receive PSI?:		Commitment Papers?:	
Paper/Hold Problem.:		State Ready Eligible Date:	
State Ready Eligible?:		Contract Inmate? N	
Special:		Date Received: 21-JUN-18	
Special Other:			
Paperwork Received by GMDC?: Y			
# of Declarations: 2		Declared Date: 13-JUL-18	
Reject Reason: ICP		Improper Comm Papers Reject Date: 13-JUL-18	

Branch to:

STATE_READY





Exhibit(A)

15-AUG-18 08:29:06 State Ready Inquiry Screen (QSR)	
BK&CS: 8951701619 Name: RODRIGUEZ, EDGARDO NYSID: 07672700K	
DOB: 28-MAR-76 1st Sentence Indic#: 02981/2013 (Q) 1st Sentence date: 12-DEC-17	
2nd Sentence Indict#: 3rd Sentence Indict#:	
Ct.Part:	Facility: OBCC Discharge Date:
Did Court Facility Receive PSI?: Commitment Papers?:	
Paper/Hold Problem.: State Ready Eligible?: Y State Ready Eligible Date: 13-AUG-18	
Special: Contract Inmate? N	
Special Other: Date Received: 21-JUN-18	
Paperwork Received by GMDC?: Y	
# of Declarations: 3 Declared Date: 14-AUG-18	
Reject Reason: Reject Date:	

Branch to:




STATE_READY

Exhibit (B)

	CORRECTION DEPARTMENT CITY OF NEW YORK		Page 1 of 2 Pages	Form: #167R-A Rev.: 01/31/08 Ref: Dk. #401GR-A
INJURY TO INMATE REPORT				
INSTRUCTIONS: Original Report to Security, One copy to Clinic Lock Box, One Copy to Inmate Medical File.				
Command: OBCC	Date: 6/25/18	CODA/OF #: 	Injury #: PY15/3959	
TO BE COMPLETED BY EMPLOYEE (PLEASE PRINT CLEARLY).				
Inmate Name (Last Name, First Name): Rodriguez, Edgardo				
Location: Upper	Work:	NYSID #: 07672700K	Book & Case/Sent #: 8951701619	
Details: On Monday June 25, 2018 at approximately 2:55 hours Inmate Rodriguez, Edgardo 8951701619 / 07672700K Claimed injury to his head, back and arm due to a slip and fall.				
Supervisor Notified (Print Last Name, First Name, Rank, Shield #): Capt Lacroix #1841				
Date: 6/25/18		Time: Approx 2:55 Hrs.		
Employee: <input type="checkbox"/> (Did) <input checked="" type="checkbox"/> (Did Not) Witness This Injury.	Employee Signature: 	Rank/Title: CC	Shield/ID #: 3600	
TO BE COMPLETED BY MEDICAL STAFF ONLY - (PLEASE PRINT CLEARLY)				
Date of Injury: 6/25/18	Reported for Medical Attention: Date 6/25/18 Hrs.	Inmate Refused Medical Attention: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Visible Injuries: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Nature of Injury and Cause: I - Embry fell back in a slip and fall. He was carrying a metal tray with a glass of water when he slipped. He fell backwards and hit his head on the floor. He also hit his back and arm.			Medical Staff Must Note Location of Injury: 	
Treatment: O - USI, stable. No fracture. Placed in cervical collar. No further treatment required.				
Treated By/Examined By (Print and Sign Full Name):			Title:	
Referrals to Other Medical Services (If Yes, Document Medical Findings): None indicated. No referral.			Title:	
Treated By/Examined By (Print and Sign Full Name):			Title:	
Please Check Disposition: <input type="checkbox"/> Return to Housing Area <input type="checkbox"/> Work Release Days <input type="checkbox"/> Light Duty Days <input type="checkbox"/> Return to Work Assignment <input type="checkbox"/> Re-Exam Days <input type="checkbox"/> Refer to Clinic <input type="checkbox"/> Return to School <input type="checkbox"/> Use Throatswing Emergency <input type="checkbox"/> Release				
Transfer to Hospital (Indicate Name of Hospital):				
Other (Please Specify):				
Treated By (Print Full Name and Sign Name):			Date: 6/27/18	Time: 11:31 Hrs
I certify that the cause of injury as stated herein is to my knowledge true and medical attention was provided.				
Inmate Signature:		B&C / Sentence #: 8951701619	Date: 6/27/18	
Witnessed By (Signature):		Rank/Title: CO	Shield / I.D. #: 2572	Date: 6/25/18

incident

Exhibit (B)

		CORRECTION DEPARTMENT CITY OF NEW YORK			
INJURY TO INMATE REPORT				Page 1 of 2 Pages	Form: #167R-A Rev.: 01/31/08 Ref.: Ds. #4916R-A
INSTRUCTIONS: Original Report to Security, One copy to Clinic Lock Box, One Copy to Inmate Medical File.					
Command OBCC	Date: 7/27/18	COD/UCF #:	Injury #: FY19-205		
TO BE COMPLETED BY EMPLOYEE (PLEASE PRINT CLEARLY).					
Inmate Name (Last Name, First Name): RODRIGUEZ, EDGARDO					
Location: 1-UPPER	Work:	NYSID #: 07672900K	Book & Case/Sent #: 8951701619		
Details: I CO HORTON #2602 Assigned 1-UPPER during 1500 X 2331 Hrs. Inmate Rodriguez-Edgardo NYSID # 07672900K B/C# 8951701619 claimed the get hurt this last night when he coming from medical reading.					
Supervisor Notified (Print Last Name, First Name, Rank, Shield #): Captain Lacorne #184				Date: 07/27/18	Time: 2000 Hrs.
Employee: <input type="checkbox"/> (Did) <input checked="" type="checkbox"/> (Did Not) Witness This Injury	Employee Signature: Hossain		Rank/Title: CO	Shield/ID#: 2602	
TO BE COMPLETED BY MEDICAL STAFF ONLY - (PLEASE PRINT CLEARLY)					
Date of Injury: 7/27/18	Reported for Medical Attention: Date 7/27/18 Hrs. 10	Inmate Refused Medical Attention: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Visible Injuries: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Nature of Injury and Cause: Left Swollen at the left ankle with tenderness on palpation. Difficulty with ambulation. of broken skin. Wounded from.			Medical Staff Must Note Location of Injury:		
Treatment: 1. Left ankle trauma. Ke back, ace bandage Analgesic for pain X-ray / medical case					
Treated By/Examined By (Print and Sign Full Name): [Signature]			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Referrals to Other Medical Services (If Yes, Document Medical Findings):					
Treated By/Examined By (Print and Sign Full Name):			Title:		
Please Check Disposition: <input type="checkbox"/> Return to Housing Area <input type="checkbox"/> Work Release <input type="checkbox"/> Days <input type="checkbox"/> Light Duty <input type="checkbox"/> Days <input type="checkbox"/> Return to Work Assignment <input type="checkbox"/> Re-Exam <input type="checkbox"/> Days <input type="checkbox"/> Refer to Clinic <input type="checkbox"/> Return to School					
<input type="checkbox"/> Life Threatening Emergency <input type="checkbox"/> Routine					
Transfer to Hospital (Indicate Name of Hospital):					
Other (Please Specify):					
Treated By (Print Full Name and Title, Sign Name): [Signature] Date: 7/27/18 Time: 10 5 Hrs					
I certify that the cause of injury as stated herein is to my knowledge true and medical attention has provided:					
Inmate Signature:		B&C/Sentence #: 895-17-01619		Date: 7/27/18	
Witnessed By (Signature): Calhoun		Rank/Title: C.O.		Shield A.D. #: 9702 Date: 7/27/18	

Accident

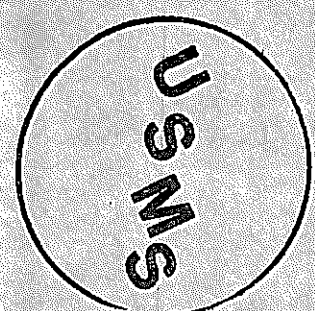
EDUARDO RODRIGUEZ
#86321-053
FCC ALLENWOOD - MEDIUM
P.O. BOX 2000
WHITE DEER, P.A. 17887

AUG 07 2019

ALLENWOOD FEDERAL CORRECTIONAL INSTITUTION
WHITE DEER, PA 17887-2600

DATE

THE ENCLOSED LETTER WAS PROCESSED THROUGH
SPECIAL MAILING PROCEDURES FOR FORWARDING TO
YOU. THE LETTER HAS BEEN NEITHER OPENED NOR
INSPECTED IF THE WRITER RAISES A QUESTION OR
PROBLEM. OVER WHICH THIS FACILITY HAS
JURISDICTION. YOU MAY WISH TO RETURN THE
ORIGINAL FOR FURTHER INFORMATION ON
CLASSIFICATION. IF THE WRITER ENCLOSES
CORRESPONDENCE FOR FORWARDING TO ANOTHER
ADDRESSEE, PLEASE PRINT THE ENCLOSED TO THE
ABOVE ADDRESS.



↔86321-053↔
Clerk Of Us District Court
225 Cadman PLZ E
Easten District Of N.Y.
Brooklyn Heights, NY 11201
United States